

	<b>DIRECT PURCHASER CAC<sup>1</sup></b>	<b>INDIRECT PURCHASER CAC<sup>2</sup></b>	<b>SEALY<sup>3</sup></b>	<b>SPRING AIR<sup>4</sup></b>	<b>H.M. RICHARDS<sup>5</sup></b>	<b>FACTORY DIRECT<sup>6</sup></b>	<b>HENSON SLEEP RELIEF<sup>7</sup></b>
<b>DEFINITION INCLUDES:</b>	Slabstock, Block Commodity foam; Molded or Engineered foam; Carpet Underlay (from scrap foam); Flexible Polyurethane foam products	Slabstock, Block Commodity foam; Carpet Underlay (from scrap foam); Flexible Polyurethane foam products	Flexible Polyurethane Foam of any grade or blend.	Flexible, Slabstock Polyurethane Foam	Polyurethane Foam (“chemically complex polymeric product having a broad range of load bearing capability and resiliency”); Polyurethane foam products	Polyurethane foam (“can be flexible or rigid”); Polyurethane foam products	Polyurethane Foam (“chemically complex polymeric product having a broad range of load bearing capability and resiliency”); Polyurethane foam products
<b>DEFINITION EXCLUDES:</b>	Rigid foam; Technical foam	Molded or Engineered foam; Rigid foam	N/A	Molded or Engineered foam; Rigid foam	N/A	N/A	N/A
<b>EXAMPLES OF FOAM USED IN:</b>	Furniture; Bedding; Packaging; Flooring; Motor Vehicles; Fibers; Healthcare; Electronics; Personal Care; Components; <i>i.e.</i> , filters, dispensers, gaskets, & seals for various products, such as blood oxygenators and hard drives	Furniture; Bedding; Packaging; Flooring; Motor Vehicles; Fibers; Healthcare; Electronics; Personal Care; Components; <i>i.e.</i> , filters, dispensers, gaskets, & seals for various products, such as blood oxygenators and hard drives	Furniture; Bedding; Flooring; Motor Vehicles	Furniture; Bedding; Packaging; Flooring; Motor Vehicles; Fibers; Healthcare; Electronics; Personal Care; Components; <i>i.e.</i> , filters, dispensers, gaskets, & seals for various products, such as blood oxygenators and hard drives; Construction; Building products; Children’s Toys; Sponge foam blocks; Bolsters; Convolute; Toppers; Antistatic foam; Anti-microbial foam; Visco-elastic foam; Sporting goods	Furniture; Bedding; Flooring; Motor Vehicles	Furniture; Bedding; Packaging; Flooring; Motor Vehicles; Fibers; Healthcare; Electronics; Personal Care; Components; <i>i.e.</i> , filters, dispensers, gaskets, & seals for various products, such as blood oxygenators and hard drives; Construction; Building products; Children’s Toys; Convolute; Toppers; Anti-noise / vibration systems	Furniture; Bedding; Flooring; Motor Vehicles
<b>ALL PLS.’ DEFINITION IN DISCOVERY<sup>8</sup></b>	Flexible Foam; Rigid Foam; Microcellular Foam; Elastometric Foam OR Industry-accepted definition						

<sup>1</sup> Direct Purchaser Plaintiffs’ Consolidated Amended Class Action Complaint, 2/28/2011 [Dkt. No. 46] at ¶¶ 1, 13-47, 56-59, 126.

<sup>2</sup> Indirect Purchaser Plaintiffs’ Consolidated Amended Complaint, 3/21/2011 [Dkt. No. 52] at ¶¶ 1, 7-20, 61-63, 138.

<sup>3</sup> Sealy Corporation, et al., Amended Complaint and Demand for Jury Trial, 7/26/2011 [Dkt. No. 198] at ¶¶ 14-56, 58.

<sup>4</sup> Spring Air International LLC, et al., Complaint, Jury Trial Demanded, Civil Action No. 1:11-pf-10007-JZ, 1/19/2011 at 1-2, ¶¶ 17-40, 54, 55.

<sup>5</sup> H.M. Richards Inc., et al., Complaint, Civil Action No. 1:11-cv-00067-SA-JAD, 3/11/2011 at ¶¶ 1, 40.

<sup>6</sup> Factory Direct, Inc., Complaint, Civil Action No. 5:11-cv-00045-D, 1/13/2011 at ¶¶ 1, 7-27, 34-36.

<sup>7</sup> Henson Sleep Relief, Inc. Complaint, Civil Action No. 1:11-pf-10009-JZ, 4/20/2011 at ¶¶ 1, 38.

<sup>8</sup> Direct Purchaser Class, Indirect Purchaser Class, and Certain Direct Action (Non-Class) Plaintiffs’ Joint First Set of Interrogatories to Defendants, 5/16/2011 at ¶ 16; Direct Purchaser Class, Indirect Purchaser Class, and Certain Direct Action (Non-Class) Plaintiffs’ Joint First Set of Requests for Production to Defendants, 4/15/2011 at ¶ 9.

**EXHIBIT A**